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June 8, 1998

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BY HAND DELIVERY

Ms. Magalie R. Salas, Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

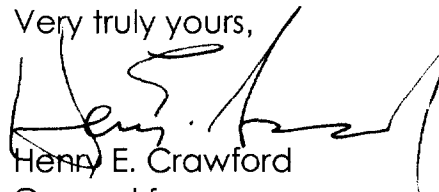
Re: In the Matter of Amendment of Section 73.202(b)
Table of Allotments FM Broadcast Stations
Comal Broadcasting Company
Pleasanton, Bandera and Hondo, Texas
MM Docket No.: 98-55; RM-9255

Dear Ms. Salas:

Transmitted herewith on behalf of Comal Broadcasting Company are an original and four (4) copies of its "Comments and Counterproposal" as directed to the Chief, Allocations Branch.

Should any additional information be required, please contact this office.

Very truly yours,


Henry E. Crawford
Counsel for
Comal Broadcasting
Company

cc: The Chief, Allocations Branch

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List A B C D E

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

In the Matter of)
)
Amendment of Section 73.202(b))
Table of Allotments)
FM Broadcast Stations)
(Pleasanton, Bandera and)
Hondo, Texas))

MM Docket No. 98-55

RM-9255

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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

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To: The Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

COMMENTS AND COUNTERPROPOSAL

Comal Broadcasting Company ("Comal Broadcasting"), by counsel,
hereby submits its comments and counterproposal in connection with the above-
captioned Notice of Proposed Rulemaking ("NPRM"), proposing the allotment of
Channel 253C2 to Blanco, Texas. As shown below, Comal Broadcasting believes
that the public interest would be better served by the allotment of Channel 253C2
to Blanco, Texas, as the station would provide a first local service to the
community of Blanco, Texas.

I. DISCUSSION

1. Under the Commission's Rules, community allotment priorities are
ranked in the following order:

- 1) first full-time service;
- 2) second full-time service;
- 3) first local service; and
- 4) other public interest matters

Co-equal weight is given to priorities 2) and 3). See Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1992).

2. As demonstrated in the engineering statement attached hereto as Exhibit 1, Comal Broadcasting's proposal would represent a first local service at Blanco, Texas. Consequently, the Blanco allotment of Channel 253C2 would be a higher and better use of the channel than the upgrade proposed by Reding Broadcasting Company. See generally, Benton, El Dorado, Hampton, Harrison, Mena and Sherwood, Arkansas; Homer, Louisiana; Salisaw and Vinita, Oklahoma; and Hooks and Hilgore, Texas, 2 FCC Rcd 1963 (1987).

3. Blanco, Texas, is the county seat of Blanco County. The city has a population of 1,238 persons, while the county has a population of 5,972 persons, according to the 1998 Rand McNally Commercial Atlas. Blanco is, therefore, a community for purposes of the Commission's table of allotments.

4. As shown in the engineering statement, FM Channel 253C2 can be assigned to Blanco, Texas, utilizing the allotment reference co-ordinates N 30-01-12, W 98-36-44 in full compliance with the Commission's spacing requirements. Moreover, a transmitter operating at the allotment site will provide sufficient city grade coverage.

5. In view of the above, Comal Broadcasting respectfully requests that the following channel changes be adopted by the Commission:

City	Present	Proposed
Hondo, Texas	253A	290A
Bandera, Texas	252A	276A
Blanco, Texas	---	253C2

6. If the Commission assigns Channel 253C2 to Blanco, Texas, Comal Broadcasting will apply for a construction permit and will construct a new facility upon award of that permit.

WHEREFORE, in accordance with the above, Comal Broadcasting Company respectfully requests that Channel 253C2 be assigned to Blanco, Texas and the proposed upgrade of FM Channel 252A at Pleasanton, Texas be denied.

June 8, 1998

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Respectfully Submitted,

Comal Broadcasting Company

By: 

Henry E. Crawford
Its Attorney

Comments and Courtnerproposal
Comal Broadcasting Company
June 8, 1998

EXHIBIT 1

Comal Broadcasting Company

ENGINEERING STATEMENT
Comments and Counterproposal
MM Docket 98-55
Pleasanton, Hondo and Bandera, Texas
June 1998

STATE OF ILLINOIS)
)
COUNTY OF PEORIA) SS:

F. W. Hannel, after being duly sworn upon oath,
deposes and states:

He is a registered Professional Engineer, by
examination, in the State of Illinois;

He is a graduate Electrical Engineer, holding
Bachelor
of Science and Master of Science degrees, both in Electrical
Engineering;

His qualifications are a matter of public record and
have been accepted in prior filings and appearances requiring
scrutiny of his professional qualifications;

The attached Engineering Report was prepared by him
personally or under his supervision and direction and;

The facts stated herein are true, correct, and
complete to the best of his knowledge and belief.



June 8, 1998

F.W. Hannel, P.E.

F. W. Hannel, PE
911 Edward Street
Henry, Illinois 61537
(309) 364-3903
Fax (309) 364-3775

Comal Broadcasting Company

ENGINEERING STATEMENT
Comments and Counterproposal
MM Docket 98-55
Pleasanton, Hondo and Bandera, Texas
June 1998

ENGINEERING STATEMENT

This firm has been retained by Comal Broadcasting Company to prepare this engineering statement in support of its counterproposal in the above captioned proceeding. This Docket 98-55 proposes that the FM Table of Allotments be amended to assign FM Channel 253C2 to Pleasanton, Texas, as an upgraded channel for the presently assigned FM Channel 252A at Pleasanton, Texas. In order to accomplish this upgrade at Pleasanton, it is proposed that FM Channel 290A be assigned to Hondo, Texas, as a replacement channel for its presently assigned FM Channel 253A, and that FM Channel 276A be assigned to Bandera, Texas, as a replacement channel for the presently assigned FM Channel 252A. Reding Broadcasting Company, licensee of Radio Station KBUC(FM) at Pleasanton, Texas, has indicated to the Commission that the licensee of KRBH(FM) at Hondo, Texas, has agreed to relocate its transmitter site, and likewise, the licensee of Radio Station KEEP(FM) at Pleasanton, Texas, has consented to the change in its channel.

It is proposed that the Commission assign FM Channel 253C2 to the community of Blanco, Texas, as a first local service. Blanco, Texas, is the

county seat of Blanco County, and the city has a population of 1238 persons. The county has a population of 5,972 persons, according to the 1998 Rand McNally Commercial Atlas.

FM Channel 253C2 can be assigned to Blanco, Texas, utilizing allotment reference co-ordinates N30-01-12, W98-36-44. This allotment site is located 20.4 km southwest of Blanco, Texas, (US Atlas co-ordinates N30-06-06, W98-25-18), and a transmitter operating from this sample site fully complies with the Commission's minimum mileage requirements provided that FM Channel 253A at Hondo, Texas, and FM Channel 252A at Bandera, Texas are relocated as proposed in the Commission's Notice of Proposed Rulemaking.

Attached as Exhibit E-1 is an FM Channel Study conducted on FM Channel 253C2 at the requested allotment reference site, N30-01-12, W98-36-44). This study clearly demonstrates that the requested allotment can be made in accordance with the minimum mileage separation of the Commission's Rules, and a transmitter operating at the allotment site will illuminate the community with the required 70 dbu city grade signal.

In view of the foregoing, it is requested that the channel changes as outlined below be adopted and that the Commission amend the FM Table of Allotments accordingly.

City	Present	Proposed
Hondo, Texas	253A	290A
Bandera, Texas	252A	276A
Blanco, Texas	----	253C2

The above change in the FM Table of Allotments provides a first local service to the Community of Blanco, Texas. As the assignment of a first local service to a community has a higher priority than the upgrade of an existing facility, the above changes in the FM Table of Allotments should be adopted and the proposed upgrade of FM Channel 252A at Pleasanton, Texas, should be denied.

Comal Broadcasting Company

ENGINEERING STATEMENT
Comments and Counterproposal
MM Docket 98-55
Pleasanton, Hondo and Bandera, Texas
June 1998

FM CHANNEL 253C2
N30-01-12
W98-36-44

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEAR
ALC	Austin	TX	251	C1	U	86.1	79.0	73.3°	7.1
KVETFM	Austin	TX	251	C1	L	78.9	79.0	73.4°	-0.0
ALC	Bandera	TX	252	A	U	50.7	106.0	243.4°	-55.3
ALC	Pleasanton	TX	252	A	U	113.3	106.0	176.0°	7.3
KBUC	Pleasanton	TX	252	A	D	113.3	106.0	176.0°	7.3
KBUC	Pleasanton	TX	252	A	D	113.3	106.0	176.0°	7.3
KBUC	Pleasanton	TX	252	A	L	113.3	106.0	176.0°	7.3
KEEP	Bandera	TX	252	A	D	49.6	106.0	248.5°	-56.4
KEEP	Bandera	TX	252	A	D	49.6	106.0	248.5°	-56.4
KEEP	Bandera	TX	252	A	L	49.6	106.0	248.5°	-56.4
ALC	Hondo	TX	253	A	U	100.7	166.0	211.5°	-65.3
ALC	Rockdale	TX	253	A	U	168.4	166.0	65.2°	2.4
KBUC	Pleasanton	TX	253	C2	A	92.8	190.0	181.3°	-97.2
KBUC	Pleasanton	TX	253	C2	A	92.8	190.0	181.3°	-97.2
KRBH	Hondo	TX	253	A	D	98.4	166.0	210.3°	-67.6
KRBH	Hondo	TX	253	A	D	98.4	166.0	210.3°	-67.6
KRBH	Hondo	TX	253	A	C	98.4	166.0	210.3°	-67.6
KRXT	Rockdale	TX	253	A	L	166.5	166.0	65.5°	0.5
ALC	San Angelo	TX	254	C	U	202.9	188.0	317.4°	14.9
KELI	San Angelo	TX	254	C	L	202.9	188.0	317.4°	14.9

Bandera to FM Channel 276A
Hondo to FM Channel 290A
As proposed in MM Docket 98-55

All distaces in km

CERTIFICATE OF SERVICE

I, Henry E. Crawford, do hereby certify that copies of the foregoing
Comments and Counterproposal have been served by United States mail,
postage prepaid this 8th day of June, 1998 upon the following:

*Pam Blumenthal
Allocations Branch, Mass Media Bureau
Federal Communications Commission
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Rock Hill, Missouri 63119

*Hand Delivered


Henry E. Crawford